

USEPA
California General Industrial Activities Storm Water Permit (CAS000001 - General Permit)
Storm Water Compliance Facility Inspection Report

WDID: 000868	Receiving Water Name: Los Angeles Harbor	
Status Code: Active	Facility Size (acres): 173	Impervious Area: 99.9%

Facility Name: Trans Pacific Container Service Corp. (Tra-Pac)
Facility Address: 920 W. Harry Bridges Blvd.
Wilmington, CA 90744
Primary Contact: Paul Richey
Facility Contact: Paul Richey
Facility Phone: (310) 513-7417
SIC Code(s): 4491 - Marine Cargo Handling

Date of Inspection: 5/16/2007
Inspector(s): M. Oxsalida (AEI)
Type of Inspection: B Type Inspection

General Results:

Trans Pacific Container Service Corp. (Tra-Pac) was inspected on 5/16/2007 to determine compliance with NPDES General Permit No. CAS000001. Trans Pacific Container Service Corp. (Tra-Pac) is categorized under SIC code 4491 - Marine Cargo Handling. The inspector met with Paul Richey to tour the facility and review relevant storm water paperwork. The inspection was conducted between 1:00:00 PM and 2:45:00 PM. Weather conditions at the time of the inspection were: clear skies, no evidence of recent rain.

Trans Pacific Container Services Corp. (Tra-Pac) performs loading and unloading of wheeled and grounded containerized cargo. The terminal occupies 173 acres at the Port of Los Angeles, and has four berths with a total length of 4,000 feet. Loading and unloading is performed by 11 post-Panamax 100 foot-guage cranes each with a main hoist capacity of 40-long-tons. The terminal features a 28,000-sq. ft. maintenance and repair facility; 550 refrigerated container plugs; 48 grounded plugs; three portable generators that maintain an additional 96 plugs; and separate wash systems for the exterior and interior of containers and vehicles. Shipping lines served at the terminal include Mitsui O.S.K., China Shipping, Norasia, Compañía Sudamericana de Vapores, Zim, Wan Hai, APL, Hyundai Merchant Marine Co., and CMA-CGM.

Facility operations include container loading and unloading, bulk (non-containerized) loading and unloading, vehicle and equipment maintenance, vehicle and container washing, and vehicle fueling. Potential storm water pollution sources include the maintenance and repair shop, the container washout rack, the vehicle and container exterior wash rack, the diesel fueling area, and trailer parking areas.

Storm water from the site drains to Los Angeles Harbor through several storm drains located throughout the facility. No unauthorized discharges were observed during the inspection.

Housekeeping throughout the facility was good. Observed yard conditions included: (1) vehicle maintenance area - several drums not on spill pallets, oily parts exposed and on ground; and (2) Trash observed throughout trailer parking areas and at fencelines of facility.

The facility's SWPPP, and 2005-2006 Annual Report were reviewed as part of the inspection. Deficiencies are presented below. The Monitoring Plan was not available for review, and the locations of collected storm water samples could not be determined. Other documents reviewed during the inspection included inspection logs, employee training records, and past annual reports. Preliminary inspection results were discussed with the facility representative.

Identified Areas of Potential Noncompliance:

000868 Facility Rating: 2

15-Jun-07

Port of Los Angeles – Trans Pacific Container Service Corp. (Tra-Pac)
(NPDES Permit No. CA000001)
Inspected by: M. Oxsalida (Amendola Engineering, Inc.)



Photo 1: Several drums at the vehicle maintenance area were not on spill pallets.



Photo 2: Catch basins adjacent to the maintenance area and the container wash areas drain to a oil/water separator for treatment prior to discharge to the industrial sewer.

Port of Los Angeles – Trans Pacific Container Service Corp. (Tra-Pac)
(NPDES Permit No. CA000001)
Inspected by: M. Oxsalida (Amendola Engineering, Inc.)

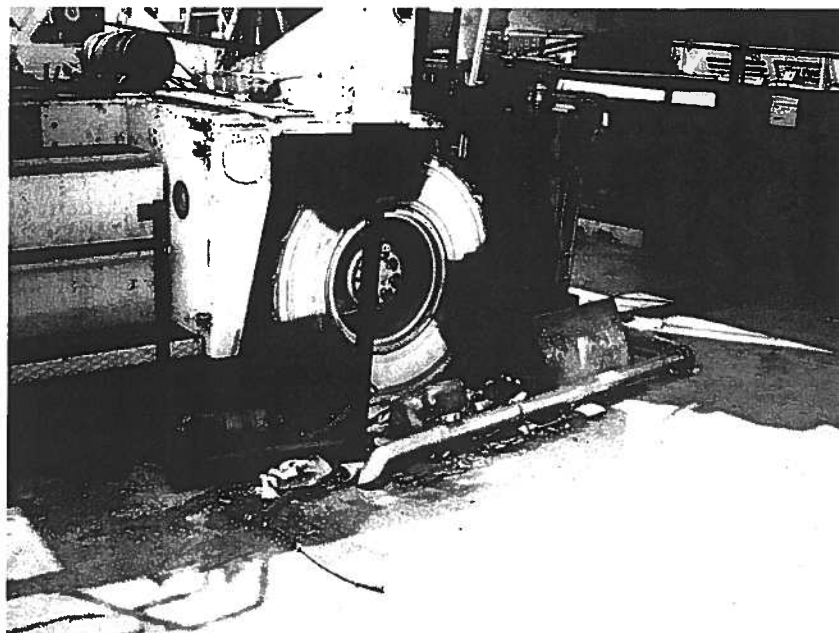


Photo 5: Oily parts on the ground at the maintenance shop.



Photo 6: A – Maintenance and repair facility
B – Vehicle/Container exterior wash rack
C – Container washout rack
(Aerial Photo Courtesy of Pictometry International Corp.)



January 17, 2008

Mr. Jeremy Johnstone
U.S. Environmental Protection Agency Region 9
Clean Water Act Compliance Office, WTR – 7
75 Hawthorne Street
San Francisco, CA 94105

Our File: 11-WL-D5380-436

Re: Findings of Violation & Order for Compliance (copy enclosed)
EPA Docket No. CWA 309(a)-08-015
Notice Dated November 9, 2007

Dear Mr. Johnstone;

With reference to Findings of Violation and Order for Compliance as noted above, we hereby submit our additional 60-day response relative to page number 5, paragraph numbers 28, 29, and 30, but do so under a time extension grant, which extends the response time to January 24, 2008.

Our re-address to the Storm Water Pollution Prevention Plan (SWPPP) centers on a full revision to the plan itself, which incorporates (1) an updated facility map; (2) a revised pollution source identification with BMP's; and (3) Designation of the SWPPP team. The revised SWPPP also includes a complete storm water monitoring program (ref. Sec. No. 7). Accompanying the revised SWPPP is a projected cost analysis for the revision and incremental implementation costs.

In addition to our response for specific compliance order items, we bring your attention to the revised plan's overall expansion of detailed address for pollution prevention. We have expanded the recognition and identification of potential pollutant sources, along with increasing and improving the corresponding BMP's as a matter for better control. Additionally, the SWPPP team as a formal designated group offers more dedicated attention to the program, and is better guided for compliance by incorporation of blank forms for reporting. In fact, the revised SWPPP has already been implemented in the interest of compliance, and as a matter of internal testing relative to evaluation for effectiveness. In noting this, we include various SWPPP reports as evidence of diligent address.

We are confident you will find our address to this matter in order, as well as, compliant with the regulatory requirements, and we await your confirmation.

Thank you.

TraPac, Inc.

920 W. Harry Bridges Blvd., • Wilmington, California 90744-5230
P.O. Box 1178 • Wilmington, California 90748-1178
(310) 830-2000 • FAX (310) 513-7410

January 17, 2008
Mr. Jeremy Johnstone
U.S. Environmental Protection Agency – Region 9
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Yours truly,
TraPac, Inc.



Frank Pisano
Vice President

I certify under penalty of law that the document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

PR/pr

Enclosure

- Tab I – Findings of Violation & Order for Compliance copy, w/response extension confirmation
- Tab II – Findings of Violation & Order for Compliance, initial 30-day response copy
- Tab III – Cost projection copy
- Tab IV – Revised SWPPP w/facility map & reporting blank forms
- Tab V – Revised SWPPP, completed reports

Cc: Mr. Ivar Ridgeway
California Regional Water Quality Control Board – Los Angeles Region
Coastal Storm Water Unit
301 West 4th Street, Suite 200
Los Angeles, CA 90013